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13 **UNITED STATES BANKRUPTCY COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

16 In re: 17 THE ORIGINAL MOWBRAY TREE 18 SERVICE, INC., 19 Debtor(s)	Chapter 11 LEAD CASE NO.: 8:24-bk-12674-SC JOINTLY ADMINISTERED WITH: CASE NO. 8:25-bk-10542-SC CASE NO. 8:25-bk-10543-SC
20 In re: 21 MOWBRAY WATERMAN PROPERTY, LLC, 22 Debtor(s)	CREDITOR RONNIE JORDAN'S RESERVATION OF RIGHTS CONCERNING FEE APPLICATIONS OF DEBTORS' PROFESSIONALS
24 In re: 25 ROBIN ELAINE MOWBRAY 26 Debtor(s)	Hearing: Date: November 18, 2025 Time: 10:00 a.m. Place: Courtroom 5C 411 West Fourth Street. Santa Ana, CA 92701
28 X Affects all Debtors	

6 Creditor Ronnie Jordan hereby reserves his right to object to all interim fees awarded when
7 final fee applications are filed, as well as to certain employment orders.

9 | Dated: November 4, 2025

Respectfully submitted by:

GOE FORSYTHE & HODGES LLP

By: /s/Robert P. Goe
Robert P. Goe
Jeffrey W. Broker
Charity J. Manee
Attorneys for Creditor Ronnie Jordan

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 17701 Cowan, Suite 210, Building D, Irvine, CA 92614

A true and correct copy of the foregoing document entitled (*specify*): **CREDITOR RONNIE JORDAN'S RESERVATION OF RIGHTS CONCERNING FEE APPLICATIONS OF DEBTORS' PROFESSIONALS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On November 4, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) November 4, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL

(state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) November 4, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

- The Honorable Scott Clarkson, USBC, 411 West Fourth Street, Suite 5130, Santa Ana, CA 92701

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 4, 2025 Kerry A. Murphy
Date *Printed Name*

/s/Kerry A. Murphy
Signature

1 1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

2 Mailing Information for Case 8:24-bk-12674-SC
3 **Electronic Mail Notice List**

4 The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

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